

2. The plaintiffs, and their predecessor in title, have been in actual or constructive and peaceable possession of the aforementioned real estate, either under color of title or claim of right by reason of adverse possession, which has been actual, open, notorious, hostile, exclusive, under claim of ownership, continuous and adverse to the defendants and all other interests in this property for a period in excess of twenty (20) years prior to the filing of this Complaint.

3. The plaintiffs are owners in fee simple of a portion of the aforementioned real estate described in Plaintiffs' Exhibit No. 1, by virtue of a Deed from Alva F. Rice and Mattie M. Rice, dated the 15th day of March, 1968, and recorded in the Frederick County Land Records in Liber 781, page 194, a copy of which is attached hereto as Plaintiffs' Exhibit No. 2, and intended to be incorporated in its entirety herein, which Deed the plaintiffs believe and aver describes, inter alia, the boundary line between their property and the defendant Eaton's property on the East as, "BEGINNING at an iron pipe driven in the ground at the northern edge of the said Road (Mountaindale Road), between the land hereby conveyed and the land of Eaton on the East, and running thence in a northwesterly direction in a straight line 445 feet, more or less, to another iron pipe, . . .".

4. The property to the North of the complained of parcel (Exhibit No. 1) is owned by the defendants, Marion W. Rice, Jr.,

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